

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In Re:

MICHAEL MOSHE COHEN,

Debtor.

CASE NO. 23-10086(SLM)

Chapter 7

Hon. Stacey L. Meisel, U.S.B.J.

OBJECTION TO SALE

Michael Moshe Cohen (“Debtor”), by and through his undersigned counsel, in response to the Notice of Proposed Sale of the Debtor’s residence located at 7 Stanford Court, West Orange, NJ, hereby objects to the proposed sale of the real property because; (1) the Trustee has failed to demonstrate that, after the satisfaction of secured claims, the Debtor’s exemption, broker’s commissions, capital gains taxes, trustee commissions, payment of professionals hired by the Trustee, and other expenses of administration, there will be any distribution to unsecured creditors and should therefore abandon the property; and (2) the Debtor has filed An Objection to the related sale motion and also filed cross motion to compel abandonment or, in the alternative, convert his case to a case under Chapter 13, both of which are incorporated herein by reference.

Broege, Neumann, Fischer & Shaver, LLC

Dated: March 5, 2024

By: /s/ Timothy P. Neumann, Esq.
Timothy P. Neumann, Esq.